

EXECUTIVE SUMMARY

This report presents my professional assessment of wildfire preparedness, emergency access, and emergency evacuation associated with the proposed Pasta Farms Major Use Permit (PL-25-71). It is submitted in my capacity as Fire Marshal for Mountain of Attention Sanctuary, a 1,000-acre nonprofit retreat located within the Seigler Springs area of southern Lake County. My assessment is based on a review of the project documents, field observations, applicable fire protection standards, and my experience with wildfire preparedness and emergency planning in this community.

The proposed project is located within a **Very High Fire Hazard Severity Zone**, where wildfire is a foreseeable and recurring condition. While the environmental documents appropriately address important fire protection measures—including defensible space, emergency water supply, and compliance with applicable fire regulations—my review found that they do not adequately evaluate how the existing roadway system would function during a rapidly developing wildfire requiring simultaneous civilian evacuation and emergency response.

In particular, I did not identify analysis addressing cumulative evacuation demand, project-specific evacuation planning, operational roadway performance during wildfire conditions, or coordination of project evacuation with neighboring communities and responding agencies. These issues are fundamental to protecting human life and are distinct from measures intended primarily to protect structures.

In my professional opinion, the current administrative record does not provide sufficient information for the Board to make informed findings regarding wildfire evacuation and public safety. The record does not adequately evaluate cumulative evacuation demand, operational roadway performance during a wildfire, or the interaction between civilian evacuation and emergency responder access. Without that information, it is not possible to fully assess the project's foreseeable life-safety impacts.

I respectfully recommend that the Board **not make final findings regarding wildfire impacts based on the current record**. Instead, the Board should require a project-specific evacuation analysis evaluating cumulative evacuation demand, emergency responder access, and roadway performance under wildfire conditions, with review by the South Lake County Fire Protection District, before determining whether the project can be approved in a manner consistent with public safety.

IF YOU HAVE LIMITED TIME, PLEASE REVIEW THE PHOTOGRAPHS ON PAGES 6-10

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Mountain of Attention Sanctuary
Lake County, California

Submitted to:

Lake County Board of Supervisors

July 13, 2026

Fire Marshal's Assessment of Wildfire Preparedness, Emergency Access, and Evacuation

1. PURPOSE OF THIS ASSESSMENT

The purpose of this assessment is to provide the Lake County Board of Supervisors with my professional evaluation of wildfire, fire protection, emergency access, and evacuation issues associated with the proposed Pasta Farms Major Use Permit (PL-25-71).

This assessment is based upon my review of the project documents, applicable fire protection standards, personal field observations, and my experience as Fire Marshal for the Mountain of Attention Sanctuary. It is intended to assist the Board in determining whether the current administrative record provides sufficient information to support informed findings regarding public safety.

My review is limited to wildfire preparedness, emergency access, fire suppression, and evacuation. Groundwater, forestry, biological resources, land use, and legal issues are addressed separately by qualified professionals retained by those purposes.

2. QUALIFICATIONS

I currently serve as the legally designated Fire Marshal for the Mountain of Attention Sanctuary, a 1,000-acre nonprofit retreat located within the Seigler Springs area of southern Lake County. My responsibilities include wildfire preparedness, fire prevention, emergency planning, defensible space, fire suppression planning, emergency communications, and coordination with local fire protection agencies.

Relevant qualifications include:

- Fire Marshal, Mountain of Attention Sanctuary
- California Wildland Firefighter (Firefighter II)

- FEMA Incident Command System (ICS-100 and ICS-700)
- Emergency Medical Responder (EMR)
- FCC General Class Amateur Radio Operator
- Fire Technology Student, Santa Rosa Junior College Public Safety Training Center

In addition to my professional responsibilities, I have longstanding familiarity with the Seigler Springs area and the roadway system serving the proposed project. That familiarity includes wildfire preparedness, emergency planning, and participation in wildfire suppression activities within this community since 1979. I currently reside on Seigler Springs North Road.

3. SCOPE OF REVIEW

This assessment is based upon my review of the following materials:

- Major Use Permit PL-25-71 Staff Report
- Draft Initial Study and CEQA documentation
- Wildfire section of the Initial Study
- Project site plans
- Property Management Plan
- Conditions of Approval
- Oak Mitigation Plan
- Applicable California Fire Code provisions
- California Public Resources Code Sections 4290 and 4291
- Historical wildfire information
- Personal field observations of the project area and primary access routes

My evaluation focuses on whether the project documents adequately address wildfire preparedness, emergency access, and public evacuation from the perspective of fire protection and life safety.

4. PROJECT SETTING

The proposed Pasta Farms project is located within a designated **Very High Fire Hazard Severity Zone (VHFHSZ)** in the wildland-urban interface (WUI) of southern Lake County. This landscape is characterized by steep terrain, dense vegetation, prolonged summer drought, and a documented history of significant wildfires.

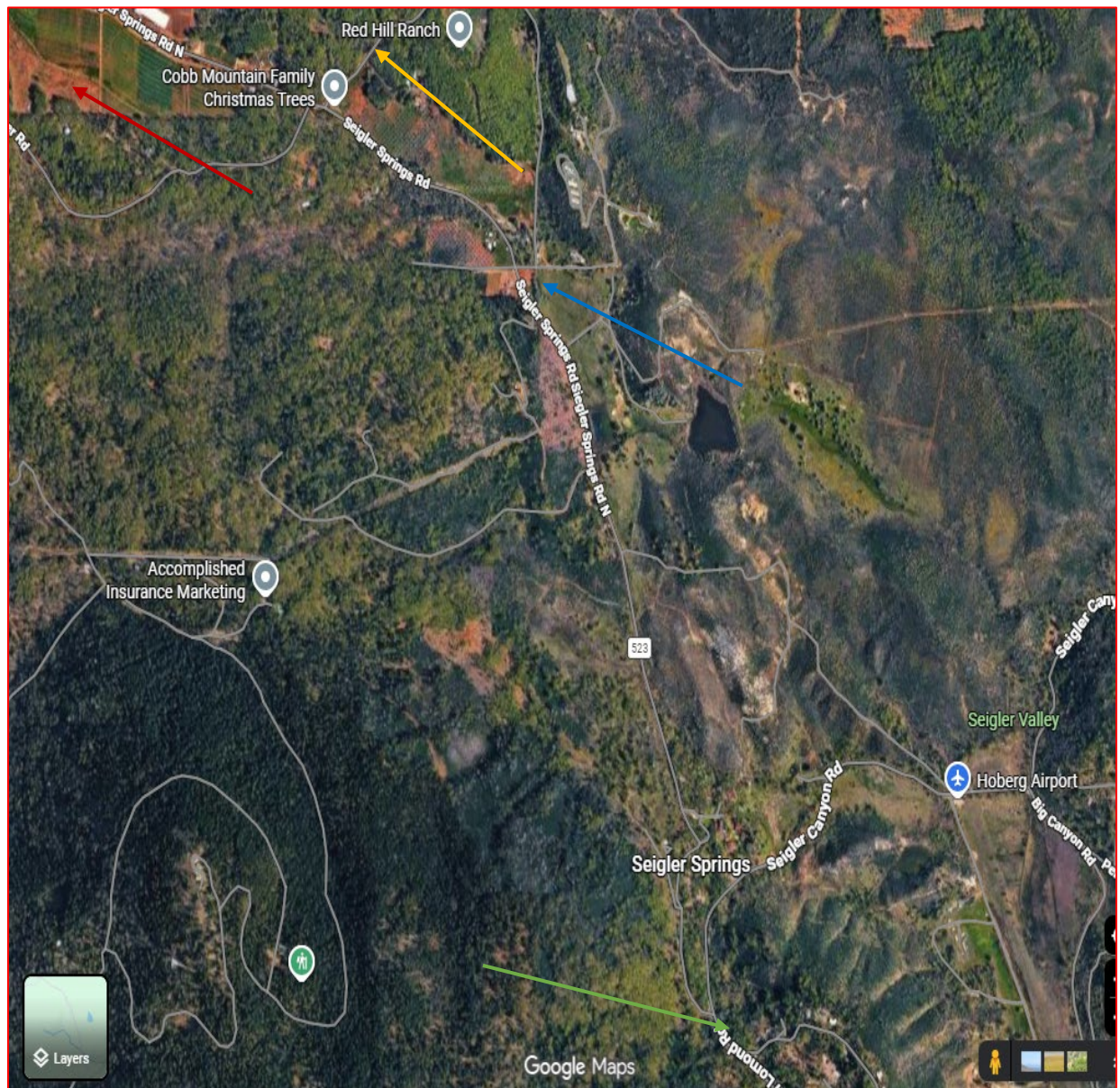
Access to the project is provided primarily by Seigler Springs North Road and connecting rural roadways, including Diener Road. These roads serve existing residences, agricultural operations, the Mountain of Attention Sanctuary, the Shenandoah subdivision, utility providers, emergency responders, and other properties located within this portion of the county.

Unlike urban transportation systems that provide multiple evacuation options, this area depends upon a limited rural road network. During a wildfire emergency, these roads must simultaneously accommodate evacuating residents, project employees, visitors, retreatants, emergency responders, utility crews, and mutual aid resources.

The purpose of this assessment is not to predict whether another wildfire will occur. Wildfire is an established and recurring characteristic of this landscape. **Rather, this assessment evaluates whether the current administrative record contains sufficient information for the Board of Supervisors to determine that public safety has been adequately considered** should a wildfire occur during the operational life of the project.

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Figure 4-1 – Regional context and primary evacuation corridor.



1 Regional context from Google Maps Red arrow = Pasta Farms; Blue arrow = Mountain of Attention northern border; Green arrow = Shenandoah subdivision; Orange arrow = Diener Road

5. LOCAL WILDFIRE CONTEXT

Southern Lake County has experienced repeated significant wildfires over the past several decades. Fires affecting the Seigler Springs area include the 1970 Seigler Fire, the 1979 Seigler Canyon Fire, and the 2015 Valley Fire.

The Valley Fire alone destroyed approximately 2,000 homes and other structures, becoming one of the most destructive wildfires in California history. More importantly, it fundamentally changed how residents, emergency responders, and public agencies evaluate wildfire preparedness and community evacuation.

California's recent wildfire experience has demonstrated that wildfire planning must extend beyond protecting individual structures. Modern wildfire planning recognizes that protecting human life depends upon effective emergency evacuation, coordinated emergency response, and transportation systems capable of functioning under rapidly changing conditions.

Accordingly, wildfire should be considered a foreseeable planning condition for this project rather than an extraordinary event.

6. EMERGENCY ACCESS

The proposed project relies upon the existing rural roadway network serving the Seigler Springs area. These roads were developed to support dispersed residential and agricultural uses and now provide access for residents, businesses, nonprofit organizations, emergency responders, and visitors.

Figure 6-1 – Beginning of Seigler Springs North Road.



Intersection of Seigler Canyon Road and SSN 120 degree

Field observations identified several roadway characteristics relevant to emergency response, including:

Figure 6-2 – Blind curve with limited sight distance.



Limited sight distance occurs at several locations along Seigler Springs North Road, reducing the ability of opposing traffic to observe approaching vehicles during emergency operations.

Figure 6-3 – Sharp turn affecting opposing traffic



Representative 90-degree turn illustrating roadway geometry and vehicle maneuvering characteristics.

Figure 6-4 Roadway width in nonpaved section



Representative roadway width along the unpaved section of Seigler Springs North Road.

Figure 6-4 – Transition to unpaved roadway



- Seasonal dust conditions reduce visibility.
- Limited opportunities for opposing traffic to pass.

Under normal traffic conditions these characteristics are manageable. During a wildfire emergency, however, they may affect the movement of evacuating civilians and responding emergency apparatus operating simultaneously.

Wildland fire response differs from routine emergency operations. Fire engines, water tenders, bulldozers, ambulances, law enforcement vehicles, utility crews, and mutual aid resources frequently enter an area while residents, employees, and visitors are attempting to evacuate. This simultaneous movement creates operational challenges that are not encountered during routine emergencies.

California Public Resources Code Sections 4290 and 4291 establish important minimum standards for emergency access and wildfire preparedness. Compliance with these standards substantially improves firefighter access and structural survivability. However, compliance with minimum roadway design standards does not necessarily demonstrate that emergency evacuation has been adequately evaluated under realistic wildfire conditions.

7. EMERGENCY EVACUATION

Life Safety

The primary objective of every wildfire response is the protection of human life. Modern wildfire planning recognizes that while structures can often be rebuilt, the loss of life cannot. Consequently, emergency planning must evaluate not only how structures will be protected, but also how people will safely evacuate when wildfire threatens a community.

Unlike urban areas with multiple transportation options, the Seigler Springs area depends upon a limited rural road network. During a wildfire, these roads must simultaneously accommodate evacuating residents, project employees, visitors, emergency responders, utility crews, and mutual aid resources.

Successful evacuation depends upon maintaining traffic flow in both directions while allowing emergency responders to reach the incident. This operational challenge cannot be evaluated solely by roadway design standards or average daily traffic volumes.

Cumulative Evacuation Considerations

Emergency evacuation within the project area should be evaluated as a cumulative event rather than on a project-by-project basis. During a significant wildfire, the following groups would likely depend upon the same roadway system:

- Permanent and seasonal residents.
- Project employees and contractors.
- Agricultural workers.
- Visitors unfamiliar with the area.
- Mountain of Attention Sanctuary staff and guests.
- Residents of the Shenandoah subdivision.
- Individuals evacuating horses and livestock.
- Emergency responders.
- Utility crews.
- Mutual aid resources.

These populations would not evacuate independently. They would rely upon the same transportation network over approximately the same period of time, creating operational demands that differ substantially from normal traffic conditions.

Figure 7-1

Residents

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Employees

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Visitors

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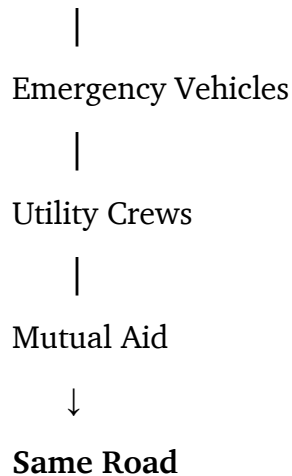
Sanctuary

|

Shenandoah

|

Horse Trailers



Operational Considerations

Wildfire evacuation presents challenges not encountered during routine emergencies. Residents are attempting to leave while fire engines, water tenders, ambulances, law enforcement officers, and other emergency resources are attempting to enter.

Smoke, reduced visibility, disabled vehicles, animal trailers, and changing fire conditions further complicate these operations. Every additional vehicle introduced into the roadway system increases the complexity of safely managing simultaneous ingress and egress.

For this reason, emergency access and evacuation should be considered components of the same life-safety system rather than independent subjects.

Assessment

Based upon my review of the environmental documents, I did not identify a project-specific evaluation of cumulative evacuation demand or an operational analysis demonstrating how the existing roadway network would function during simultaneous civilian evacuation and emergency response.

In my professional opinion, emergency evacuation represents one of the most important public safety considerations associated with this project and merits additional analysis before final project approval.

8. ASSESSMENT OF THE WILDFIRE ANALYSIS

The environmental documents appropriately recognize that the project is located within a Very High Fire Hazard Severity Zone and identify wildfire as a potentially significant environmental issue. The documents also discuss defensible space, emergency water supply, roadway standards, and compliance with applicable fire regulations.

These measures represent important components of wildfire preparedness and should remain integral elements of the project.

However, from a fire protection perspective, these measures primarily address protection of the project itself rather than the operational challenges associated with community evacuation.

My review did not identify analysis addressing:

- Project-specific evacuation planning.
- Cumulative evacuation demand.
- Simultaneous emergency responder ingress and civilian egress.
- Operational performance of the roadway system during wildfire conditions.
- Effects of smoke, reduced visibility, or disabled vehicles on evacuation.
- Coordination of project evacuation with surrounding communities.

The Initial Study concludes that wildfire impacts would be less than significant based upon compliance with applicable fire regulations and the limited number of project employees. Those considerations are relevant. However, in my professional opinion, they do not fully evaluate how the existing transportation network would function during a rapidly developing wildfire requiring simultaneous evacuation and emergency response.

Protecting structures and protecting people are related but distinct public safety objectives. While compliance with applicable fire regulations improves structural survivability, emergency evacuation requires evaluation of operational conditions affecting the movement of people under emergency circumstances.

Accordingly, I believe additional evacuation analysis would strengthen the administrative record and assist the Board in evaluating the project's public safety impacts.

9. PROFESSIONAL FINDINGS

Based upon my review of the project documents, applicable fire protection standards, field observations, and professional experience, I make the following findings:

Finding 1

The proposed project is located within a Very High Fire Hazard Severity Zone where wildfire is a foreseeable and recurring environmental condition.

Finding 2

The project area has experienced multiple significant wildfires, demonstrating that emergency evacuation is a realistic planning consideration rather than a speculative event.

Finding 3

Emergency access to the project and surrounding communities depends upon a limited rural roadway network with operational characteristics that should be considered during wildfire evacuation.

Finding 4

The proposed project will increase commercial activity within an area already dependent upon this transportation system.

Finding 5

Emergency evacuation should be evaluated cumulatively because residents, neighboring developments, project employees, visitors, emergency responders, and mutual aid resources would all rely upon the same roadway network during a significant wildfire.

Finding 6

The environmental documents appropriately address many important fire protection measures, including defensible space, emergency water supply, and compliance with applicable fire regulations.

Finding 7

Based upon my review of the Pasta Farms application, I find no project-specific evaluation of cumulative evacuation demand or operational roadway performance during simultaneous evacuation and emergency response.

Finding 8

Based upon my review, the current administrative record does not provide sufficient information to evaluate cumulative evacuation demand or operational roadway performance during a wildfire emergency. In my professional opinion, the Board would benefit from a project-specific evacuation analysis, reviewed by the South Lake County Fire Protection District, before making final findings regarding wildfire impacts.

10. CONCLUSIONS

Wildfire is an inherent characteristic of the Seigler Springs landscape and should be considered a foreseeable planning condition throughout the operational life of the proposed project.

The project documents demonstrate substantial attention to fire protection through defensible space, emergency water supply, roadway standards, and compliance with applicable fire regulations. These measures contribute significantly to wildfire preparedness and should remain important components of the project.

The Initial Study concludes that wildfire impacts would be less than significant based upon compliance with applicable fire regulations and the limited number of project employees. Those considerations are relevant. However, in my professional opinion, they do not provide sufficient information to evaluate how the existing transportation network would function during a rapidly developing wildfire requiring simultaneous civilian evacuation and emergency response.

Based upon my review, the current administrative record does not contain sufficient information for the Board to fully evaluate cumulative evacuation demand, operational roadway performance, or coordination of project evacuation with surrounding communities and responding agencies. These issues are central to the protection of public safety in a Very High Fire Hazard Severity Zone.

Accordingly, I respectfully recommend that, before making final findings regarding wildfire impacts, the Board direct the preparation of a project-specific evacuation analysis addressing these issues and that the analysis be reviewed by the **South Lake County Fire Protection District**, as the local fire protection agency with primary responsibility for emergency response and evacuation planning within the project area. Such a review would provide the Board with a more complete factual basis upon which to make informed findings regarding public safety.

11. RECOMMENDATIONS

To further support informed public safety findings, I respectfully recommend consideration of the following:

1. Prepare a project-specific emergency evacuation analysis evaluating project employees, residents, visitors, emergency responders, and neighboring communities.
2. Evaluate cumulative evacuation demand associated with existing and foreseeable development utilizing the same roadway system.
3. Assess operational roadway performance during simultaneous civilian evacuation and emergency responder ingress.
4. Coordinate project emergency planning with CAL FIRE, the South Lake County Fire Protection District, the Lake County Sheriff's Office, and other responding agencies.
5. Develop a written Wildfire Emergency Operations Plan addressing employee notification, evacuation procedures, emergency communications, accountability, and coordination with responding agencies.
6. Provide annual wildfire preparedness and evacuation training for project personnel.
7. Continue evaluating feasible measures that improve emergency access and reduce evacuation conflicts where practical.